

**IN THE UNITED STATES DISTRICT COURT
DISTRICT COURT OF MARYLAND**

CAROLYN HALL,

Plaintiff,

v.

SHEPPARD PRATT
HEALTH SYSTEM, INC.

Defendant.

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Case No. 1:22-cv-03261-BPG

Joint Initial Report

Pursuant to the Court's Scheduling Order Plaintiff, Carolyn Hall ("Plaintiff"), and Defendant Sheppard Pratt Health System, Inc. ("Defendant" or "Sheppard Pratt"), by and through their respective counsel, hereby submit this joint initial report and state as follows:

1. At this time, the parties do request a settlement/ADR conference.
2. The parties agree that there is some amount of discovery of electronically stored information implicated in the matter, and the parties agree to further confer on the scope and delivery of electronically stored information as discovery progresses.
3. The parties do not request any modifications to the Scheduling Order.
4. The parties agree to defer expert discovery until after summary judgment motions are resolved.
5. The parties request that each side be allowed a total of 20 deposition hours.

Date: February 3, 2023

Respectfully submitted,

/S/

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(Signed by Paul Burgin with authorization
of Theresa Kraft)
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*(Signed by Paul Burgin with
Permission of Theresa Kraft)*

/S/

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